

Message

From: Thomas, Chris [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7689684B746E42D98DD772875D817104-THOMAS, CHRISTOPHER]
Sent: 7/13/2020 3:33:26 PM
To: Jones, Erica [Jones.Erica@epa.gov]; Hesterlee, Craig [Hesterlee.Craig@epa.gov]
Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

No, we haven't had a discussion on this concept with Jeaneanne. It was her idea. I don't have a strong thought either way – things are going to be what they're going to be regardless of what bins we have to put things into. I would think HQs wouldn't want to make a bin for "special permits" or everyone would want to put their permits into it to get more time.

From: Jones, Erica <Jones.Erica@epa.gov>
Sent: Monday, July 13, 2020 11:17 AM
To: Thomas, Chris <Thomas.Chris@epa.gov>; Hesterlee, Craig <Hesterlee.Craig@epa.gov>
Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Let me discuss with her first. Did you all have this idea? I'm not sure it would be a productive solution. We are given the chance to set monthly targets for the year which can account for permits that aren't issued in 180 days at no penalty to the region (i.e. red on the bowling chart). If we had a new metric, we would still have to set targets that may be missed if we receive an application we were not expecting. The current metric needs an EOY target of 0, OW is clear on that. But we can have a backlog throughout the year as long as we target appropriately and end with 0 as the goal. I see the countermeasure as a relatively easy alternative to a new metric that accounts for unpredictability, and I don't know how a new metric would solve that.

Looking back at this year, we knew we had kampachi coming into the FY20. What we know now is that because kampachi falls into the category of "new or unusual permits" we should have targeted more conservatively, for the potential that it would not be issued for a long time. In the current bowling chart system there is no penalty for over targeting. That said, this year if there is any potential to receive the Manna permit, I would target 1 for each month of the year and end with 0, with a goal of issuing the permit by the end of FY21.

Please let me know what you think. If you agree I will explain this to Jeaneanne.

From: Thomas, Chris <Thomas.Chris@epa.gov>
Sent: Monday, July 13, 2020 11:02 AM
To: Hesterlee, Craig <Hesterlee.Craig@epa.gov>; Jones, Erica <Jones.Erica@epa.gov>
Subject: FW: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Can one of you please put together a short comment for Jeaneanne that accomplishes this?

From: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Sent: Monday, July 13, 2020 10:37 AM
To: Hesterlee, Craig <Hesterlee.Craig@epa.gov>; Jones, Erica <Jones.Erica@epa.gov>; Thomas, Chris <Thomas.Chris@epa.gov>; Allenbach, Becky <Allenbach.Becky@epa.gov>
Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Did we want to send up some cautionary language on another aquaculture permit? I suggest we include a comment that essentially says we believe there should be a category for new or unusual permits (e.g., similar to what happened on Kampachi) because completing a countermeasure is not productive when you are simply working through a normal permitting process, but have an unprecedented number of comments.

jmg

From: Hesterlee, Craig <Hesterlee.Craig@epa.gov>

Sent: Monday, July 13, 2020 9:54 AM

To: Jones, Erica <Jones.Erica@epa.gov>; Thomas, Chris <Thomas.Chris@epa.gov>; Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>; Allenbach, Becky <Allenbach.Becky@epa.gov>

Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Sorry- no- I thought I was being asked again for this month's numbers. Trying to get through email a little too fast this morning.

- Number of New Permit Applications in Backlog. Zero
- Number of Backlogged Permits for Existing Permitting. Zero

Send to Kevin Weiss and copy Chris Kloss and Maria Lopez-Carbo.

Craig Hesterlee, Chief
NPDES Permitting Section
EPA Region 4 Water Division
404.562.9749

From: Jones, Erica <Jones.Erica@epa.gov>

Sent: Monday, July 13, 2020 9:47 AM

To: Thomas, Chris <Thomas.Chris@epa.gov>; Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>; Allenbach, Becky <Allenbach.Becky@epa.gov>

Cc: Hesterlee, Craig <Hesterlee.Craig@epa.gov>

Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Chris and Craig, you are proposing the end of year target for FY21 for the metric "Number of New Permit Applications in Backlog" to be 1? I thought we were planning to issue Kampachi by the end of FY20. I think we need to discuss this.

From: Thomas, Chris <Thomas.Chris@epa.gov>

Sent: Monday, July 13, 2020 9:00 AM

To: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>; Allenbach, Becky <Allenbach.Becky@epa.gov>

Cc: Hesterlee, Craig <Hesterlee.Craig@epa.gov>; Jones, Erica <Jones.Erica@epa.gov>

Subject: FW: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

As requested. . .

From: Hesterlee, Craig <Hesterlee.Craig@epa.gov>

Sent: Monday, July 13, 2020 8:34 AM

To: Thomas, Chris <Thomas.Chris@epa.gov>

Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

- Number of New Permit Applications in Backlog. 1 (Kampachi)
- Number of Backlogged Permits for Existing Permitting. Zero

Send to Kevin Weiss and copy Chris Kloss and Maria Lopez-Carbo.

Craig Hesterlee, Chief
NPDES Permitting Section
EPA Region 4 Water Division
404.562.9749

From: Thomas, Chris <Thomas.Chris@epa.gov>
Sent: Monday, July 13, 2020 8:07 AM
To: Hesterlee, Craig <Hesterlee.Craig@epa.gov>
Subject: FW: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

I need this this morning. . . In addition to our proposals for the metrics that Kevin requested info on we need to send Jeaneanne info on the following:

- Number of New Permit Applications in Backlog.
- Number of Backlogged Permits for Existing Permitting.

And the contact Jeaneanne should send the info to. . . I'm assuming Kevin and copy Chris and Maria?

Thanks!

From: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Sent: Friday, July 10, 2020 3:29 PM
To: Smith, Brian <Smith.Brian@epa.gov>; Thomas, Chris <Thomas.Chris@epa.gov>
Cc: Allenbach, Becky <Allenbach.Becky@epa.gov>; Jones, Erica <Jones.Erica@epa.gov>
Subject: FW: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Chris and Brian,

On Monday, please send me, Becky and Erica your targets and the person who I should respond to with the target.

Thanks
jeaneanne

From: Vazquez, Sharon <Vazquez.Sharon@epa.gov>
Sent: Friday, July 10, 2020 3:27 PM
To: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Cc: Fong, Tera <Fong.Tera@epa.gov>; Laureano, Javier <laureano.javier@epa.gov>; Libertz, Catherine <Libertz.Catherine@epa.gov>; Maguire, Charles <maguire.charles@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; O'Connor, Darcy <oconnor.darcy@epa.gov>; Opalski, Dan <Opalski.Dan@epa.gov>; Robichaud, Jeffery <Robichaud.Jeffery@epa.gov>; Torres, Tomas <Torres.Tomas@epa.gov>; Guilaran, Yu-Ting <Guilaran.Yu-Ting@epa.gov>; Miller, Tracey <Miller.Tracey@epa.gov>; Moore, Kristie <Moore.Kristie@epa.gov>; Nelson, Tomeka <Nelson.Tomeka@epa.gov>; Moody, Christina <Moody.Christina@epa.gov>
Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Hi Jeaneanne,

Thanks for the question. Yes, please respond to the requests from OGWDW and OWM on target setting. We will work with our offices to confirm that targets are reviewed by WDDs before submittal.

Thanks,
Sharon

Sharon Vázquez
Director, Resource Management Staff
Office of Water
US Environmental Protection Agency
202-564-1622

From: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Sent: Friday, July 10, 2020 1:36 PM
To: Vazquez, Sharon <Vazquez.Sharon@epa.gov>
Cc: Fong, Tera <Fong.Tera@epa.gov>; Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>; Laureano, Javier <laureano.javier@epa.gov>; Libertz, Catherine <Libertz.Catherine@epa.gov>; Maguire, Charles <maguire.charles@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; O'Connor, Darcy <oconnor.darcy@epa.gov>; Opalski, Dan <Opalski.Dan@epa.gov>; Robichaud, Jeffery <Robichaud.Jeffery@epa.gov>; Torres, Tomas <Torres.Tomas@epa.gov>
Subject: RE: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Sharon,

Can you clarify if you are asking for our response to the OCFO request. I have not yet responded because I was waiting to hear from OW.

Thanks
jeaneanne

From: Vazquez, Sharon <Vazquez.Sharon@epa.gov>
Sent: Friday, July 10, 2020 1:32 PM
To: Water Program Contact List - Directors <Water.Program.Contact.List.Directors@epa.gov>; Water Program Contact List - Deputy Directors <Water.Program.Contact.List.Deputy.Directors@epa.gov>
Cc: Best-Wong, Benita <Best-Wong.Benita@epa.gov>; OW Office Directors <OWOfficeDirectors@epa.gov>; OW Deputy Office Directors <OWDeputyOfficeDirectors@epa.gov>; OW Staff Directors <OW.Staff.Directors@epa.gov>; Varnado, Miriam <Varnado.Miriam@epa.gov>; Moody, Christina <Moody.Christina@epa.gov>; Moore, Kristie <Moore.Kristie@epa.gov>; Nelson, Tomeka <Nelson.Tomeka@epa.gov>; Frace, Sheila <Frace.Sheila@epa.gov>
Subject: FYI: Discussion of FY 2021 Target-Setting for Permitting Measures

Water Division Directors,

We received inquiries from a few directors expressing concerns and requesting engagement about the FY 2021 target setting process.

First of all, we'd like to let you know that the request came from OCFO in advance of their normal process and it was sent-out to the NPMs that contribute specifically to the Agency-wide permitting metrics, i.e.:

- Number of New Permit Applications in Backlog.
- Number of Backlogged Permits for Existing Permitting.

The Office of Wastewater Management and the Office of Groundwater and Drinking Water have likely reached-out to their regular performance measure contacts in your programs to request input on this request as OCFO set a deadline of July 24.

As you may be aware, the FY 2020-2021 Agency Priority Goals set FY 2021 targets for these metrics: ***EPA will reduce the backlog of new permitting-related decisions to zero and reduce the backlog of permit renewals by 50%.*** OCFO is looking at whether those targets are realistic and if not, why. They are also looking into how to count/not count those permits that have complex issues. If it looks like the existing targets are not realistic, OCFO is considering requesting a change to the targets. It is not known whether Henry Darwin will consider revising the FY 2021 permit targets, but OCFO wanted to gather information just in case. We suspect that is why they sent the request in advance of the normal target setting process.

We understand your request for WDD level engagement on the target setting process and we want to take this opportunity to update you on current thinking for FY 2021 target setting for our bowling chart. We are expecting OCFO's Integrated Guidance this week or next week. Once we receive their guidance, we can finalize dates and plans for target setting. Our plan is to work with you for FY 2021 target setting. Below is the tentative OW plan:

- OW IO will reach-out to the Headquarters Program Offices to identify which metrics may change in FY 2021. OCFO will be requesting this information soon. It is our current understanding that we will not have to provide how/why the metrics are changing, nor will be limited to making changes to additional metrics that may be not be included on the initial list.
- OW Program Offices will provide DRAFT FY 2021 end-of-year targets as a starting point for discussion for performance metrics.
- OW will then meet with the Water Division Directors to discuss FY 2021 target parameters we're working around and kick-off the process for working with the Regions to develop FY 2021 targets.
- Water Division Directors or their designees develop monthly FY 2021 targets for Regional metrics.
- Regions and OW Program Offices staff work together on proposed FY 2021 targets provided by the Regions.
- OW Program Offices will meet with the Water Division Directors to finalize targets before beginning political review.
- Political review of FY 2021 targets.
- Share political reviewed FY 2021 targets with Program Offices and Regions.

As a heads-up, we learned that OCIR and Region 9 will be leading a process to work with NPMs and Regions to develop divisional-level metrics that NPMs will discuss at a regular frequency with the Regions. Our understanding is there may be some overlap with the existing bowling charts, but there may be metrics that are only tracked at the division level and not at the RA/AA level.

Please let me or Kristie Moore (202-566-1616) on my staff know if you have questions or concerns.

Thank you,
Sharon

Sharon Vázquez
Director, Resource Management Staff
Office of Water
office: (202) 566-1616